

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

ERIC C. PEARCE,

Plaintiff,

v.

KEITH BAUMM, and ADVANCED  
COMPOSITE ENGINEERING D/B/A  
AEGIS BICYCLES, and AEGIS  
HANDMADE CARBON FIBER  
BICYCLES D/B/A AEGIS BICYCLES,  
and AEGIS RACING BIKES USA,  
LLC, D/B/A AEGIS BICYCLES, and  
FASTBIKES USA, LLC, D/B/A  
AEGIS BICYCLES, and  
WYMAN-GORDON INVESTMENT  
CASTINGS, INC., and STURM,  
RUGER & CO, INC.

Defendants.

CIVIL ACTION NO.  
1:05-cv-11694

STURM, RUGER & CO., INC'S  
MOTION TO ADMIT JAMES B. VOGTS PRO HAC VICE

Sturm, Ruger & Co., Inc., by and through the undersigned attorney, hereby move pursuant to Local Rule 83.5.3(b) for the admission *pro hac vice* of Attorney James B. Vogts, of Wildman, Harrold, Allen & Dixon, 225 West Wacker Drive, Chicago, Illinois 60606-1229.

Pursuant to his Affidavit submitted herewith as Exhibit "A", James R. Vogt is a member in good standing of every bar of every jurisdiction where he has been admitted to practice, specifically the State of Illinois, The United States District Court for the Northern District of Illinois and the United States Court of Appeals for the Seventh Circuit. (See Exhibit "A" attached.)

Mr. Vogt is counsel for Sturm, Ruger & Co., Inc. and by reason of this attorney-client relationship, Mr. Vogt has specialized skill and knowledge with respect to affairs important to the trial of this case. Further, a member of the Massachusetts bar will be present at all Court proceedings and will sign all pleadings, briefs and other papers filed with the Court.

For the foregoing reasons, Sturm, Ruger & Co., Inc. respectfully requests that the Court admit Pro Hac Vice James B. Vogt for the duration of this lawsuit.

**Sturm, Ruger & Co., Inc.**  
By its attorneys,

/s/ Christopher A. Callanan  
Richard L. Edwards (BBO# 151520)  
Christopher A. Callanan (BBO# 630649)  
Campbell Campbell Edwards & Conroy  
One Constitution Plaza  
Boston, MA 02129  
(617) 241-3000

**CERTIFICATE OF SERVICE**

I certify that a copy of the above document was served to the following counsel of record by the ECF system on April 30, 2007.

*Counsel for Eric C. Pearce*  
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/s/ Christopher A. Callanan  
Christopher A. Callanan

## **EXHIBIT A**

**THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

ERIC C. PEARCE,

**Plaintiff,**

**V.**

**CIVIL ACTION NO.:**

**1:05-cv-11694**

**KEITH BAUMM; ADVANCE  
COMPOSITE ENGINEERING d/b/a  
AEGIS BICYCLES; AEGIS  
HANDMADE CARBON FIBER  
BICYCLES, LLC d/b/a AEGIS  
BICYCLES; AEGIS RACING BIKES  
USA, LLC d/b/a AEGIS BICYCLES;  
FASTBIKES USA, LLC d/b/a  
AEGIS BICYCLES; WYMAN-  
GORDON INVESTMENT  
CASTINGS, INC.; and STURM,  
RUGER & CO., INC.,**

**Defendants.**

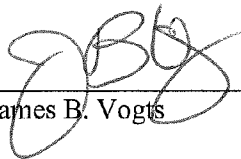
**AFFIDAVIT OF JAMES B. VOGTS**

I, James B. Vogts, certify as follows:

1. I am an attorney admitted to practice in the State of Illinois, the United States District Court for the Northern District of Illinois and the United States Court of Appeals for the Seventh Circuit. I am an attorney in good standing as a member of the bar of every jurisdiction where I have been admitted to practice.

2. There are no disciplinary proceedings pending against me as a member of the bar of any jurisdiction.

3. I am familiar with the Local Rules of the United States District Court of Massachusetts. A motion for my admission *pro hac vice* in this case will be made by a member of this District Court, Christopher A. Callanan.



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James B. Vogts